

FILED  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

2020 NOV -5 P 3:50

CAROL L. MICHEL  
CLERK

# FELONY

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**INDICTMENT FOR VIOLATIONS OF THE FEDERAL CONTROLLED  
SUBSTANCES ACT AND THE FEDERAL GUN CONTROL ACT**

UNITED STATES OF AMERICA

v.

NAVORIOUS HILLS

\* CRIMINAL NO.

\* SECTION:

\* VIOLATIONS: 18 U.S.C. § 924(c)(1)(A)(i)  
21 U.S.C. § 841(a)(1)  
\* 21 U.S.C. § 841(b)(1)(C)

\* \* \*

The Grand Jury charges that:

**COUNT 1**  
**(Distribution of a Controlled Substance)**

On or about May 15, 2020, in the Eastern District of Louisiana, the defendant, **NAVORIOUS HILLS**, knowingly and intentionally distributed a quantity of oxycodone, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

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Process \_\_\_\_\_  
Dkt'd \_\_\_\_\_  
CtRmDep \_\_\_\_\_  
Doc. No. \_\_\_\_\_

**COUNT 2**

**(Possession of a Firearm in Furtherance of Drug Trafficking Crime)**

On or about May 15, 2020, in the Eastern District of Louisiana, the defendant, **NAVORIOUS HILLS**, did knowingly possess a firearm, that is, a Glock 43 9mm handgun bearing serial number BEMC857, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, distribution of a controlled substance, as charged in Count 1; all in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

**NOTICE OF FORFEITURE**

1. The allegations of Counts 1 and 2 of this Indictment are incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States.

2. As a result of the offense alleged in Count 1, the defendant, **NAVORIOUS HILLS**, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any property constituting or derived from any proceeds obtained directly or indirectly as the result of said offense, and any property used or intended to be used in any manner or part to commit or to facilitate the commission of said offense, including but not limited to:

\$930.00 U.S. currency;

Glock 43, 9mm handgun, bearing serial number BEMC857;

6 – 9mm live rounds, FC brand;

Magazine;

Holster.

3. As a result of the offenses alleged in Counts 1 through 3, the defendant, **NAVORIOUS HILLS**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), any firearm or ammunition

involved in or used in the commission of said offenses, including but not limited to any firearm or ammunition described above.

4. If any of the above-described property, as a result of any act or omission of the defendant:


- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

the United States shall seek a money judgment and, pursuant to Title 21, United States Code, Section 853(p), forfeiture of any other property of the defendant up to the value of said property.

A TRUE BILL:



PETER G. STRASSER  
UNITED STATES ATTORNEY

  
CHARLES D. STRAUSS  
Assistant United States Attorney  
Bar Roll No. 36039

New Orleans, Louisiana  
November 5, 2020